



U.S. Department of Energy
**National Transportation
Program**
The Focal Point of All DOE Transportation

Field Office Transportation Evaluation Program (FOTEP)

Management Plan

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MISSION STATEMENT

Identified in Department of Energy (DOE) Order 460.2, Departmental Materials Transportation and Packaging Management, the National Transportation Program, Albuquerque (NTP-A) has the responsibility to ensure that DOE Operations and Field Offices comply with applicable international, federal, state, tribal and local laws, rules, and regulations and DOE Order and policy for transportation and packaging operations. Section 5 (a)(9) of DOE Order 460.2 states; “Conducts technical assessments of DOE Field elements, including related contractors, and as needed, provides assistance in transportation and packaging management activities to ensure compliance with applicable requirements. In July 1997, DOE redeployed parts of the headquarters transportation and packaging functions to two other Operations Offices creating an operational triumvirate among DOE Headquarters, Albuquerque and Idaho Operations Offices creating the National Transportation Program (NTP). Roles and responsibilities are delineated in a Memorandum of Understanding (MOU) between the three parties involved. Headquarters has the responsibility for the development of policy and guidance, Albuquerque has the responsibility of operations management of DOE policy and guidance and Idaho has the responsibility for systems engineering. It is through this MOU that NTP-A has the responsibility to implement the requirements of DOE Order 460.2, specifically section 5(a)(9).

Since the writing of this Order, the DOE has made significant changes in its organization and structure and has added the National Nuclear Security Administration (NNSA). This program will also apply to those Operations or Field Office locations whose transportation and packaging activities are under the guidance and control of NNSA.

The NTP-A, Field Office Transportation Evaluation Program (FOTEP) establishes a systematic approach for DOE (Headquarters, NTP-A, and Program Office) to evaluate and enhance transportation and packaging regulatory and DOE Order compliance. This systematic approach provides a management tool for maintaining compliance with regulatory requirements, providing access to methodologies that enhance management and operational practices, and addressing stakeholder concerns through effective interaction.

FOTEP PROCESS

FOTEP evaluation teams, consisting of subject-matter experts from DOE, will collect information to establish that overall program objectives are being achieved. The process will verify whether DOE Order and policy requirements are effectively implemented. This process allows senior management to identify problems, prepare and implement corrective actions, identify and build on strengths, and manage DOE transportation activities more effectively, while enhancing the level of program management and oversight.

Through this process, FOTEP evaluation teams endeavor to assist transportation and packaging personnel in finding the cause(s) behind deficiencies, and foster development of management or procedural systems that continually maximize regulatory compliance, increase efficiency, enhance worker safety, and provide a method of demonstrating continuous improvement.

FOTEP evaluations can be performed in one of two ways. The first allows the individual Field Office to utilize the FOTEP checklist to perform a self-assessment. This self-assessment can be a valuable tool to each Field Office to identify any deficiencies in its level of compliance with DOE Orders and/or policy affecting transportation operations. If the results of the self-assessment evaluation are satisfactory, an onsite visit may not be necessary. However, the Field Office would have to provide objective evidence to answer all of the applicable questions found in the FOTEP checklist.

The second is the scheduling of an onsite visit by NTP-A and/or other responsible PO to ensure compliance with applicable DOE Order or program requirements that are specific to the Field Office's transportation and packaging activities. When identifying the scope of the FOTEP activity, not all questions identified in the checklist may need to be answered or evaluated. The scope of the onsite evaluation can be by mutual consent of the party requesting the evaluation and the Field Office to be evaluated. The scope can vary based on programmatic need and other questions not specifically identified in the checklist, but may be added before the visit or asked while onsite.

Management strengths and weaknesses, and any observations and recommendations related to the fundamental management objective listed in section 5.0 Technical Evaluation Performance Objective criteria, should be characterized and communicated in a report that is clear, concise, and useful. The report format is identified in Standard Operating Procedure NTP-A-FOTEP.002, Section 4.5. This report will ensure that the proper requirements and objectives are identified and performed in a timely, effective, and efficient manner. Deficiencies identified in the report can be indicative of ineffective and inefficient management operations systems performance. Deficiencies are pursued by the evaluation team and the root cause(s) are identified in the final report along with recommendation(s) for potential corrective actions. However, direction of formal corrective actions are the responsibility of the evaluated Field Office, not NTP-A or other Program Offices.

MANAGEMENT PLAN

1.0 PURPOSE

The purpose of this management plan is to describe the system used by the Department of Energy (DOE), and/or the National Nuclear Security Administration (NNSA) as assigned to NTP-A or other Program Offices, to administer the Field Office Transportation Evaluation Program (FOTEP).

2.0 SCOPE

This plan describes the systematic approach used by NTP-A/PO to perform transportation and packaging evaluation activities based on documented criteria, procedures, and requirements (applicable DOE Orders, directives and policies). The plan also describes the NTP-A/PO approach for providing transportation and packaging assistance to DOE/NNSA Field Offices to promote safety, economy, and efficiency, and to ensure regulatory compliant transportation and packaging operations.

3.0 RESPONSIBILITIES

The following personnel are responsible for the indicated activities:

- NTP-A/PO: Perform FOTEP activities to include the verification of Field Office transportation and packaging oversight management systems and activities.
- Evaluation Team Leader: Assumes a leadership role during pre-evaluation, evaluation, and post-evaluation activities. Evaluation Team Leader also provides site management interface. Evaluation Team Leader must be NTP-A/PO and/or a designated DOE/NNSA employee.
- Evaluation Program Coordinator (EPC): A DOE/NNSA employee or designated contractor who will coordinate, implement, and administer FOTEP activities. The EPC may assist NTP-A/PO, if requested, in the selection of members for the evaluation team and/or in organizing and directing the evaluation process. If the EPC is a DOE/NNSA employee they may or may not be an evaluator. If he/she is to perform that function, then they must meet the requirements listed in Section 8.0.
- Evaluation Team Member(s): A DOE/NNSA federal employee who by qualification of experience, training, and/or education that participates on the evaluation team and can demonstrate fulfillment of specific requirements as they relate to the FOTEP process. Further criteria are located in Section 7.0 of this document.

4.0 PERSONNEL STANDARDS/ QUALIFICATIONS

NTP-A will identify and maintain a list of qualified personnel to participate as members of FOTEP evaluation teams. Selection of personnel to participate on evaluation teams shall be based upon qualification including training and experience commensurate with the scope and complexity of the operation, activity, or organization being evaluated.

At a minimum, Evaluation Team Members must:

- not have any direct responsibility for performance of operations or activities being evaluated
- have successfully completed recognized training (DOE Auditor/Lead Auditor, ISO 9000/14000, American Society for Quality Control [ASQC], etc.) and/or equivalent training approved by NTP-A

NOTE: Participants that have experience commensurate with the scope and complexity of evaluation and/or assistance activities to be performed may be utilized until required training is successfully completed

- be aware of and understand applicable NTP-A procedures and the FOTEP Management Plan

5.0 TECHNICAL EVALUATION PERFORMANCE OBJECTIVE CRITERIA

The FOTEP Performance Objective is used by evaluation team members as part of the compliance checklist. This Performance Objective is a thesis statement representing the overall performance objective the evaluators will use for the checklist. The performance objective will address the development and implementation of policies and procedures in a consistent and accountable manner for the activities identified in the checklist. The performance objective identified for FOTEP is:

Field Office Transportation and Packaging Operations: Field Office transportation and packaging management provides implementation of applicable DOE Order requirements, departmental policies, and procedures pertaining to DOE transportation and packaging management.

6.0 PROGRAM DESCRIPTION

FOTEP has been developed to establish the process of evaluating and enhancing transportation and packaging DOE Order and policy compliance across the DOE complex. The program is intended to be a useful tool for maintaining or coming into full compliance with applicable DOE Order and policy requirements and responsibilities

FOTEP evaluations may be performed in one of two ways. The first is for NTP-A/PO to request the DOE Field Office, or the Field Office may self-impose, the conduct of a self-assessment utilizing the checklist developed for FOTEP. If the Field Office chooses to self-impose a self-assessment and share the results with NTP-A/PO, then objective evidence should be provided to

answer all applicable questions found in the FOTEP checklist. If the self-assessment is requested by NTP-A/PO then the same objective evidence should also be provided. If the results of the self-assessment evaluation are satisfactory, an onsite visit may not be necessary

The second may be the scheduling of an onsite visit by NTP-A/PO to ensure compliance with the requirement of DOE Orders and/or policy that are specific to the Field Office transportation and packaging activities.

The FOTEP Plan was developed to implement requirements and guidance of applicable DOE Orders. The program consists of a FOTEP Management Plan, Standard Operating Procedure (SOP), and Checklist. The FOTEP Management Plan provides the purpose, mission, and administrative guidelines for FOTEP activities. These activities will be conducted at various DOE Field Office transportation and packaging operations and will include, but not be limited to:

- evaluation of DOE Orders, directives, and policy compliance
- evaluation of DOE transportation and packaging management programs

It is a requirement in DOE Order 460.2 that NTP-A conduct technical assessments of DOE Field Elements, including related contractors, and as needed, provide assistance in transportation and packaging management activities to ensure compliance with applicable requirements. The Order goes on to state that Program Offices have the responsibility to ensure that DOE Field Elements and contractors under their purview involved in performing or managing transportation and packaging operations fully implement and comply with the requirement of this Order. NTP-A and Program Offices are charged with the responsibility of evaluating the effectiveness of the DOE Field Office oversight of its contractors' systems/activities.

6.1 Use of the Checklists as a Self-Assessment Document

NTP-A/PO will provide the selected Field Office transportation and packaging operation with the FOTEP Management Plan, the appropriate NTP-A-FOTEP procedure, and checklist to be completed. Both paper and electronic formats will be provided. The electronic format will be in the official DOE-designated word processing format.

The Field Office will complete the self-assessment utilizing the checklist provided and following the instructions in Section 7.0 of this document and procedure NTP-A-FOTEP.001, and submit the self-assessment to NTP-A/PO.

NTP-A/PO will review the Field Office(s) self-assessment. NTP-A/PO will issue a determination letter to the evaluated Field Office reporting the results of the self-assessment review within 30 days after receipt of the self-assessment. The letter will communicate any issues, concerns, or discrepancies discovered while reviewing the Field Office(s) self-assessment(s).

The evaluated Field Office will respond to issues identified in the determination letter. This letter could request additional information needed to clarify issues, concerns or request the development of a corrective action plan if necessary.

NTP-A/PO will track issues, close issues or, if appropriate, proceed with the onsite FOTEP activities as defined in procedure NTP-A-FOTEP.002.

NTP-A/PO will issue a final closeout letter to the evaluated Field Office. This letter may request an onsite FOTEP evaluation due to continued issues, concerns, or discrepancies. The letter will identify either the entire checklist or specific sections of the checklist that will be addressed during the onsite evaluation.

6.2 NTP-A and/or Program Offices Compliance Evaluations

NTP-A/PO may conduct an onsite Field Office evaluation utilizing the FOTEP checklist following the objective evidence methodology identified in section 7.0.

NTP-A/PO will identify Field Office evaluation activities to take place during each fiscal year.

NTP-A/PO is responsible for Field Office selection based on the following criteria:

1. High-visibility concerns associated with transportation and packaging operations that could cause adverse safety conditions, or conditions of non-compliance with regulatory or policy requirements
2. Stakeholder concerns (e.g., Congressional inquiries, tribal concerns, state and local area inquiries) that require evaluation of transportation and packaging activities conducted at a specific Field Office
3. Previous concerns/unresolved issues from transportation-related site assessments, evaluations or appraisals (e.g., Tiger Teams, Safety & Health Technical Safety Appraisals, etc.)
4. Initiation of shipment campaigns that could invoke high levels of institutional concern
5. Changes in Field Office transportation management personnel
6. Changes in the contractor transportation management personnel
7. Decrease in safety and/or operational performance based on established internal (ORPS, ETAS, SMIP, etc.) and/or external (DOT, newspapers, newsletters, trade journals, etc.) performance indicators.

Procedure NTP-A-FOTEP.002 for Planning, Conducting, Documenting, Reporting, and Tracking of evaluation activities specifies a consistent approach for planning, conducting, documenting, reporting, follow-up, and closeout of all evaluation activities. NTP-A/PO is responsible for implementing this procedure in conducting FOTEP activities.

The final report documents the FOTEP activity at the evaluated Field Office location. An example of the suggested final report format can be found in procedure NTP-A-FOTEP.002, Section 4.5. The report will include an introduction, scope, summary of evaluation activities, list assistance provided, conclusions, and recommendations. The final report will be distributed to the evaluated Field Office as well as the responsible HQ Program Office. As stated above, any follow-up activities are identified in NTP-A-FOTEP.002.

7.0 PURPOSE AND GUIDELINES FOR CHECKLIST

The checklist is designed to be used in evaluating the overall performance of the Field Office transportation operations. The checklist specifically addresses functions surrounding the DOE Order and policy requirements and responsibilities of Field Offices. All questions in the checklist refer to compliance with DOE Orders and policy.

The checklist is a means of collecting data on the Field Office's overall transportation and packaging operations responsibilities. Each question may be answered either "yes," "no" or "not applicable" (N/A). The use of "N/A" should be reserved only for instances in which the activity in question is not required and should not be used if "no" is the more appropriate answer.

In situations where the actual response is not fully "yes" or fully "no", evaluator should select "no" as the answer. A comment area is also provided to allow the Field office or evaluator to add any comment they deem necessary to further clarify the response (e.g. quote procedure title and/or number, brief explanation of the process, etc.).

Only objective evidence should be collected to support the "yes" or "no" answers to questions. Objective evidence is defined in the International Organization for Standards (ISO) document ISO 8402:1994, Quality Management/Assurance Vocabulary as "information which can be proved true, based on facts, obtained through observation, measurement, test or other means." The checklist provides DOE-HQ, NTP-A, and Program Offices with a "snapshot" of the Field Office's operation at a particular point in time. Over a number of evaluations, the data gathered may be used to determine the existence of trends within the Field Office system. This will assist DOE with issues of nonconformance, and identification and recommendation of corrective actions.

8.0 EVALUATOR QUALIFICATIONS

Evaluators must undergo training to ensure competence in the skills required for carrying out their functions. Of particular relevance are techniques of examining, questioning, evaluating, and reporting. Additional skills for managing an evaluation are required such as planning, organizing, communicating, and directing. Such competence should be demonstrated through written or oral examination, or other acceptable means.

Evaluators should be open-minded and mature; possess sound judgement, analytical skills, and tenacity; have the ability to perceive situations in a realistic way, understand complex operations from a broad perspective, and understand the role of individual units within the overall organization. Figure 8-1 demonstrates the criteria required to be an Evaluation Team Leader/Member:

Screening Criteria			
Description of Criterion	Group A	Group B	Group C
Evidence of education	Bachelor's Degree	Associate's Degree	High School or GED
Work Experience <ul style="list-style-type: none"> Transportation/packaging 	4 years	8 years	15 years
Evaluator Training/Certification	One of the following is required to meet this criterion: <ul style="list-style-type: none"> DOE Transportation and Traffic Management Functional Area Qualification Standard DOE Hazardous Materials Basic Training Modules or equivalent DOE Advanced Hazardous Materials Training Modules or equivalent DOE Basic Transportation Management Workshop or equivalent Certification as a Quality Systems Auditor from a nationally recognized program (RAB/ASCQ ISO 9000/14000) Certification by a company, federal agency, or international organization (e.g. DuPont, DOE, DOT, DoD, RAB) as a Quality Systems Auditor 		
Evaluator Experience	10 evaluation days including 3 two-day or greater evaluations	20 evaluation days including 6 two-day or greater evaluations	30 evaluation days including 10 two-day or greater evaluations

Figure 8-1 Screening Criteria for Candidate Evaluators

Evaluation Team Leaders are ultimately responsible for all phases of the onsite evaluation. The Team Leader should have management capabilities and experience and should be given authority to make final decisions regarding the conduct of the evaluation and any evaluation observations.

Evaluation Team Leaders' responsibilities also cover:

- assisting with the selection of other evaluation team members
- preparation of the evaluation plan
- representing the evaluation team with the evaluatee's management
- submitting the final evaluation report

Evaluators should apply these attributes in order to obtain and evaluate objective evidence fairly:

- remain true to the purpose of the evaluation without apprehension or favor
- constantly evaluate the effects of evaluation observations during the evaluation
- treat concerned personnel in a way that will best achieve the evaluation purpose
- perform the evaluation process without deviation due to distractions
- commit full attention and support to the evaluation process
- react effectively in stressful situations
- arrive at generally acceptable conclusions based on evaluation observations
- remain true to a conclusion despite pressure to change that is not based on evidence

9.0 FOTEP PROGRAM EVALUATION

FOTEP is intended to be a means to improve the quality and performance of transportation and packaging operations activities throughout the DOE complex. To ensure the program's validity and proper maintenance, the FOTEP Management Plan shall be self-assessed each fiscal year against applicable criteria and requirements.

NTP-A will review the FOTEP Management Plan and Standard Operating Procedure annually, or as needed, to ensure compliance with DOE Orders, policy, and requirements. NTP-A shall review the FOTEP Checklist annually, or as needed, to maintain compliance with DOE Orders and/or policy.

10.0 REFERENCES

1. U.S. Department of Energy (DOE) Order 414.1A, *Quality Assurance*, September 29, 1999.
2. U.S. Department of Energy (DOE) Order 460.1A, *Packaging and Transportation Safety*, October 2, 1996.
3. U.S. Department of Energy (DOE) Order 460.2, *Departmental Materials Transportation and Packaging Management*, September 27, 1995.
4. *Requirements for National Transportation Program-Albuquerque in the Planning, Conducting, Documenting, Reporting, and Tracking of Compliance Evaluation Activities of Field Office Reviews (NTP-A-FOTEP.001)*
5. *Type B Accident Investigation Board Report of the December 15, 1997, Leakage of Waste Containers near Kingman, Arizona*
6. *EM-1 Memorandum, Request for Field Manager Certification of Low-Level Waste Packaging and Transportation Practices, dated February 6, 1998*
7. *Container Working Group, April 1998 Report, Recommendations for Meeting Department of Transportation Requirements for Strong-Tight Containers and Industrial Packaging*